

Exhibit 2

ESCOBEDO
&
CARDENAS
ATTORNEYS AT LAW

JOE ESCOBEDO*
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LUIS M. CARDENAS*
luis@escobedocardenas.com

December 29, 2020

VIA CMRRR
and FAX: (503) 772-4266
Brooklyn Specialty Insurance
5630 University Parkway
Winston-Salem, NC 27105

VIA CMRRR
and FAX: (956) 685-3067
Josiah's Trucking, LLC
7612 Petirrojo St.
Edinburg, Texas 78542

Re: December 18, 2020 crash in Edinburg, Texas

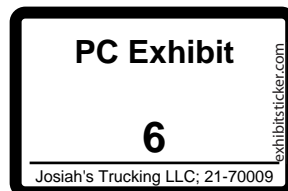
To Whom It May Concern:

This firm represents the family of Carlos M. Tellez, deceased. Mr. Tellez was the driver that was killed as a result of a crash with Josiah's Trucking tractor-trailer in Edinburg, Texas on December 18, 2020. Any further communications with our clients, relating to this incident should be directed to this office.

Our initial investigation has revealed that the tractor-trailer involved in this incident is owned and/or operated by Josiah's Trucking, LLC. In order to perform our investigation, we require the inspection of the tractor-trailer involved in the incident, while still in the same condition in which it was found at the time of the incident. For these reasons, we request that the tractor-trailer involved in the incident not be repaired, disassembled, or have any component parts replaced until it has been inspected by this firm. Any change or alteration to the tractor-trailer involved in this incident may be considered spoliation of evidence in any future legal proceedings.

Further, the purpose of this letter is to demand the preservation of the following evidence relating to this incident, your driver and your company:

1. All driver logbooks for the driver of the subject truck for the two years preceding the date of the incident;



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2. Any contracts, leases and agreements involving your truck and/or driver involved in this incident;
3. Bills of lading, consignor=s shipping orders and shipping tickets regarding the load being transported at the time of the incident;
4. All fuel receipts, dispatch records, trip sheets and pay checks relating to the trip occurring at the time of the incident in question and preceding week;
5. All data relating to the electronic control module (ECM), black box, any onboard computer or other engine or system computer for the tractor-trailer involved in the incident for the day of the incident and the two years preceding the incident;
6. The actual electronic control module, black box, onboard computer, or other engine computer containing the data referred to in the preceding paragraph;
7. All computerized tracking information, including GPS and radar records for the driver and/or the tractor-trailer, including satellite tracking, driver messaging, dispatcher=s sheets, registers, and other records pertaining to movement of the truck involved in the incident for the two (2) year period prior to the incident;
8. Driver qualification and personnel file of the driver of the subject tractor-trailer and all other personnel records, including all drug and alcohol testing records for the entire duration of his employment;
9. All driver vehicle inspection reports, repair documents, and certification of the driver=s review for the tractor-trailer for the three (3) months prior to the incident;
10. All documents and reports relating to your drug and alcohol program, including any reports relating to the truck driver of the subject tractor-trailer for the last two (2) year period;
11. All company policies and guidelines (either in written form or in an audio/video format) relating to training and safety of your drivers;
12. All reports regarding any reported incidents involving the truck driver of the subject truck and/or your company for the last three (3) year period;
13. All periodic inspection reports for the tractor-trailer involved in this incident for the two (2) years prior to this incident;
14. Any and all other documents or tangible items in your control regarding this incident, your driver or the tractor-trailer involved in the above-referenced incident;
15. Any records relating to your company document, data and/or information retention policy; and

December 29, 2020


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16. The truck drivers personal and company provided cell phone and cell phone records for the day of the incident.

In the event that any of the above evidence is destroyed, lost or altered, please be advised that we will pursue destruction or spoliation of evidence remedies in any future legal proceedings.

Very truly yours,

ESCOBEDO & CARDENAS, L.L.P.


Luis Cardenas by Perm A. Price

LMC:ap

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p>	
<p>1. Article Addressed to:</p> <p>Brooklyn Specialty Ins 5630 University Parkway Winston-Salem, NC 27105</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>2. Article Number (Transfer from service label)</p> <p>16 2070 0000 7372 1546</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>9590 9402 4913 9032 4014 28</p>		<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	

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<p>Postage \$</p> <p>Total Postage and Fees \$</p>	
<p>Sent To</p> <p>Street and Apt. No., or PO Box No.</p> <p>City, State, ZIP+4®</p>	
<p>PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>X <i>Fuleja</i></p>	
<p>1. Article Addressed to:</p> <p><i>Isiah's Trucking LLC</i> <i>7612 Petirrojo St.</i> <i>Edinburg TX 78539</i></p> <p>9590 9402 4913 9032 4014 04</p>		<p>B. Received by (Printed Name)</p> <p><i>Fuleja</i></p>	<p>C. Date of Delivery</p> <p><i>12-31-20</i></p>
<p>2. Article Number (Transfer from card label)</p> <p>7015 1520 0003 5129 0263</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
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<p>OFFICIAL USE</p>	
<p>Certified Mail Fee \$</p> <p>Extra Services & Fees (check box, add fee as appropriate)</p> <p><input type="checkbox"/> Return Receipt (hardcopy) \$</p> <p><input type="checkbox"/> Return Receipt (electronic) \$</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery \$</p> <p><input type="checkbox"/> Adult Signature, if Required \$</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery \$</p> <p>Postage \$</p> <p>Total Postage and Fees \$</p>	<p>Sent To <i>AP Slick</i></p> <p>City, State, ZIP+4®</p> <p>Postmark (date)</p> <p><i>Charles</i> <i>Fille</i> <i>Spoilatin</i></p>
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Page: 004

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ESCOBEDO & CARDENAS, LLP

1602 Dulcinea

Edinburg, Texas 78539

Telephone: (956) 630-2222 | Telecopier: (956) 630-2223

fax

TO:

FROM: Luis Cardenas/Amparo Price

COMPANY: Josiah's Trucking LLC

PAGES: 4

FAX NO. (956) 685-3067

DATE: December 29, 2020

RR: Carlos Tellez, Jr.

CC:

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Comments: Please see attached notice letter. If you have any questions concerning this fax, please contact Amparo Price via email at amparo@escobedocardenas.com or 956 630 2222.

See attached letter.

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1602 Dulcinea

Edinburg, Texas 78539

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